

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
22	All documents reflecting communications among and/or involving SiteOne employees concerning Don's: (1) non-competition covenant; and (2) non-solicitation agreement.	N/A	NO	NA	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	N/A	(Don OR Caroleo) AND (non-competition OR non-solicitation OR compet* OR solicit*)		10/1/2022 - present
23	All documents referencing Don subsequent to October 19, 2022.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	Don	9/1/2022 - present	10/19/2022 - present

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how to repeat at head on excel	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶ 56 of the Complaint.	¶ 56 Although no one identified this as a risk to SiteOne at the time, with the benefit of hindsight, this was clearly Giordano's first attempt to steal information from SiteOne using an external drive plugged into Casper's computer (which computer was used for bookkeeping).	NO	N/A	<ol style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa 	N/A	repair* AND (computer OR laptop OR desktop) AND drive	N/A	10/20/2022 - present
26	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶ 57 of the Complaint.	<p>¶ 57 Around the same time Don Caroleo left the company, Giordano also began regularly making comments and insinuations to the legacy Garden Department employees that he would not remain with SiteOne for very long after Don Caroleo's departure, such as, "I don't know how much longer I'll be here." (Trauma , r 3.) Giordano also began speaking negatively about SiteOne to his fellow employees, doing his best to portray the company in a bad light. (Trauma , r 4.) Giordano told SiteOne employees that SiteOne would "get rid of" them, that the company would not pay them as promised, and other things of that nature. (Id.)</p>	NO	N/A	<ol style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa 	N/A	(Nick OR Giordano) AND (Alex OR Trama) AND (remain* OR stay* OR leaver OR "get rid")	N/A	10/19/2022 - present

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27	¶ 58 of the Complaint. All documents referencing communication with and/or among SiteOne employees concerning the allegation in	¶ 58 In November 2022, SiteOne first began suspecting Don Caroleo was planning to open a competing business. (Catalano ,r 8.) This suspicion was based on a report SiteOne received that Don Caroleo purchased a parcel of land suitable for a landscaping supply operation just four miles from SiteOne's Coram location. It has now been determined that the property Don Caroleo purchased is located at 38 Yaphank Middle Island Road, Middle Island, New York (the "Middle Island Road" property). (Id.) This information came to SiteOne by way of a customer who informed SiteOne that he had been outbid by Don Caroleo on the parcel of land in question. (Id.)	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalano, Anthony 5. Giordano, Nick 6. Passaro, Gerard 7. Peattie, Kevin 8. Sausto, Phil 9. Trama, Alex 10. Thistle, Greg	1. Black, Doug 2. Catalano, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(new business or competing business or new company or competing company) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Don OR Caroleo) AND (land OR property) AND (purchase* OR buy* OR bought OR outbid)	1/1/2019 to present	10/1/2022-present

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27	¶ 58 of the Complaint. All documents referencing communication with and/or among SiteOne employees concerning the allegation in	¶ 58 In November 2022, SiteOne first began suspecting Don Caroleo was planning to open a competing business. (Catalano ,r 8.) This suspicion was based on a report SiteOne received that Don Caroleo purchased a parcel of land suitable for a landscaping supply operation just four miles from SiteOne's Coram location. It has now been determined that the property Don Caroleo purchased is located at 38 Yaphank Middle Island Road, Middle Island, New York (the "Middle Island Road" property). (Id.) This information came to SiteOne by way of a customer who informed SiteOne that he had been outbid by Don Caroleo on the parcel of land in question. (Id.)	YES	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Koch, Taylor 12. D'Onofrio, Jesse 13. Marx, Teresa 14. Caroleo, Don 15. Giordano, Nick 16. Brisendine, Briley	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa	38 Yaphank or Middle Island Road or horseblock or horse block or narrow way 2	N/A	N/A	10/1/2022
28	¶ 59 of the Complaint. All documents referencing communication with and/or among SiteOne employees concerning the allegation in	¶ 59. This information was consistent with what Don Caroleo once told one of his former SiteOne co-workers. Sometime in 2022, Don Caroleo mentioned purchasing land near SiteOne's Coram, New York location and that he had decided to open a nursery business after his contract with SiteOne "expired." (Kersnowski ,r 4.)	YES	1. Catalono, Anthony 2. Passaro, Gerard 3. Peattie, Kevin 4. Sausto, Phil 5. Trama, Alex 6. Thistle, Greg 7. D'Onofrio, Jesse 8. Marx, Theresa	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa	Don or Vic or Nick	(Don OR Caroleo) AND (Brian OR Kersnowski) AND (land OR property OR nursery) AND purchas*	3/1/2023 - present	1/1/2022 to present

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29	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶ 60 of the Complaint.	¶ 60. Don Caroleo even told this co-worker something to effect of, "I can even put the business in my sister's name," which the co-worker took to mean that Don Caroleo was contemplating possibly establishing a competing business in his sister's name to avoid directly violating the contractual non-compete restrictions he was subject to with SiteOne. (Id.) Don Caroleo also alluded to his former co-worker that employees at Garden Department locations SiteOne acquired from Don Caroleo would "follow him" if and when he left the company and started a competing business. (Id.)	YES	1. Catalono, Anthony 2. Passaro, Gerard 3. Peattie, Kevin 4. Sausto, Phil 5. Trama, Alex 6. Thistle, Greg 7. D'Onofrio, Jesse 8. Marx, Theresa	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	Don or Vic or Nick	Don or Vic or Nick (Don OR Caroleo) AND (sister* OR Vic* OR Dad OR relativ*)	3/1/2023 - present	1/1/2022 to present
30	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶¶ 61 through 64 of the Complaint.	¶ 61. However, with no additional information other than the purchase of a piece of land and vague statements about potential future plans made months earlier, there was nothing SiteOne could do at the time.	YES	1. Caroleo, Don 2. Catalono, Anthony 3. Giordano, Nick 4. Passaro, Gerard 5. Peattie, Kevin 6. Sausto, Phil 7. Trama, Alex 8. Thistle, Greg 9. D'Onofrio, Jesse 10. Marx, Theresa	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(theft or steal* or stole* or missing or raid) and (cabinet or files or paper or computer or laptop) and (Don or Nick or Nicholas or Giordano or Caroleo)	(theft or steal* or stole* or missing or raid or took or gone) and (cabinet or files or paper or computer or laptop) and (Don or Nick or Nicholas or Giordano or Caroleo)	9/1/2022 to present	1/16/2023 to present

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30	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶¶ 61 through 64 of the Complaint.	<p>¶ 62. On January 16, 2023, two SiteOne employees who had worked closely with Giordano at the Coram location for more than 15 years Alex Trauma and Gerard Passaro came into work one morning and noticed Giordano's desktop computer missing from his desk. (Passaro ,r 7; Trauma ,r 7.)</p> <p>¶ 63. When questioned about the missing computer, Giordano told them his computer had "crapped out" and that he had thrown it into the dumpster located onsite at the Coram store. (Id.) Passaro found this extremely odd; he therefore went and looked in the dumpster and the computer was not there and the dumpster had not been emptied. (Passaro ,r 7.) Following this incident, Giordano began using a different desktop computer from another sales desk. (Passaro ,r8; Trauma ,r 7.)</p>	YES	<p>1. Caroleo, Don</p> <p>2. Giordano, Nick</p> <p>3. Passaro, Gerard</p> <p>4. Trama, Alex</p> <p>5. D'Onofrio, Jesse</p> <p>6. Marx, Theresa</p>	<p>1. Black, Doug</p> <p>2. Catalono, Anthony</p> <p>3. Passaro, Gerard</p> <p>4. Peattie, Kevin</p> <p>5. Sausto, Phil</p> <p>6. Trama, Alex</p> <p>7. Thistle, Greg</p> <p>8. Justice, Jerry</p> <p>9. Ketter, Joe</p> <p>10. Korsnowski, Brian</p> <p>11. Francassi, Lynn</p> <p>12. Hoffman, Brian</p> <p>13. Ferrante, Anthony</p> <p>14. Koch, Taylor</p> <p>15. D'Onofrio, Jesse</p> <p>16. Marx, Teresa</p>	(dumpster or computer or laptop or desktop) and (Don or Nick or Nicholas or Giordano or Caroleo)	(dumpster or computer or laptop or desktop) and (Don or Nick or Nicholas or Giordano or Caroleo) AND (Alex OR Trama OR Gerard OR Passaro)	9/1/2022 to present	1/16/2023 to present

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31	¶ 68 of the Complaint. All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶ 68 of the Complaint.	¶ 68. During the winter's off-season months, the Coram location closes at 4:00 p.m. (Trauma, i 6.) In the weeks leading up to Giordano's departure from SiteOne in January and February 2023, Trauma happened to drive by the Coram location on multiple occasions after hours and after dark (approximately 6:30 p.m.) and saw Giordano's vehicle parked at the store. (Id.) Although Trauma does not know what Giordano was doing at the store after hours, this struck Trauma as somewhat odd for Giordano to be there that late in the day during the off-season. (Id.)	YES	1. Trama, Alex	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(late or "after dark") and Nick	Trama AND (driv* OR drove) AND Coram	1/1/2023 to 3/1/2023	1/1/2023 to present

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32	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶¶ 69 through 73 and 75 of the Complaint.	<p>¶ 69 On or about January 23, 2023, 20-year legacy Garden Department employee Phil Sausto was approached outside of work (at the gym) by a former Garden Department employee. (Sausto, r3.) This individual told Sausto he spoke with Giordano at the property located on Middle Island Road, and that Giordano told him "we" are opening a nursery business on that property. (Id.) This is the same property identified to SiteOne in November 2022 as having been purchased by Don Caroleo.</p> <p>¶ 73 Passaro saw Gomez and then-current SiteOne employee Juan Flores-Suarez working at the site. (Passaro, r 11.) Passaro also saw a vehicle bearing to logo of a SiteOne customer, Veridian Group, parked at the site. (Id.) Passaro took photos of the site while he was there, which are attached to his Declaration. (Id.) This was during normal SiteOne business hours. (Id.) Passaro reported this information to SiteOne via the company's Ethics Hotline on January 25, 2023; a copy of his report is attached to his Declaration. (Id.)</p>	YES	<p>1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Koch, Taylor 12. D'Onofrio, Jesse 13. Marx, Teresa 14. Caroleo, Don 15. Giordano, Nick 16. Brisendine, Briley</p>	<p>1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa</p>	38 Yaphank or Middle Island Road or horseblock or horse block or narrow way 2	(Phil OR Sausto) AND (Nick OR Giordano) AND (outside OR work OR gym) AND "we"	N/A	1/1/2023 to present

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32	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶¶ 69 through 73 and 75 of the Complaint.	<p>¶ 69 On or about January 23, 2023, 20-year legacy Garden Department employee Phil Sausto was approached outside of work (at the gym) by a former Garden Department employee. (Sausto ,r3.) This individual told Sausto he spoke with Giordano at the property located on Middle Island Road, and that Giordano told him "we" are opening a nursery business on that property. (Id.) This is the same property identified to SiteOne in November 2022 as having been purchased by Don Caroleo.</p> <p>¶ 73 Passaro saw Gomez and then-current SiteOne employee Juan Flores-Suarez working at the site. (Passaro ,r 11.) Passaro also saw a vehicle bearing to logo of a SiteOne customer, Veridian Group, parked at the site. (Id.) Passaro took photos of the site while he was there, which are attached to his Declaration. (Id.) This was during normal SiteOne business hours. (Id.) Passaro reported this information to SiteOne via the company's Ethics Hotline on January 25, 2023; a copy of his report is attached to his Declaration. (Id.)</p>	YES	<p>1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Passaro, Gerard 7. Peattie, Kevin 8. Sausto, Phil 9. Trama, Alex 10. Thistle, Greg</p>	<p>1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa</p>	(new business or competing business or new company or competing company) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Don or Nick or Nicholas or Giordano or Caroleo) AND (Gerard OR Passaro) AND ethics	1/1/2019 to present	1/1/2023 to present

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32	All documents referencing communication with and/or among SiteOne employees concerning the allegation in ¶¶ 69 through 73 and 75 of the Complaint.	¶75 Shortly after this, two other SiteOne customers with whom Sausto works regularly told him that Don Caroleo and Giordano were starting a new nursery. (Sausto ,r 6.) Additionally, one of the employees Sausto supervises relayed to him that at least three SiteOne employees (Juan and Jorge Suarez-Flores, who are brothers, and Antonio Rio-Garcia) were going to work for Don Caroleo at his new nursery. (Id.) Those three individuals left SiteOne within a day or so of Giordano's termination (which is discussed below). (Id.)			<ol style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa 	(Phil OR Sausto) AND (Don OR Caroleo OR Nick OR Giordano) AND (customer* OR Juan OR Jorge OR Antonio OR Suarez* OR Flores)	(Phil OR Sausto) AND (Don OR Caroleo OR Nick OR Giordano) AND (customer* OR Juan OR Jorge OR Antonio OR Suarez* OR Flores)		1/1/2023 to present
36 37	<p>All documents reflecting communications between any SiteOne employee and any Town of Brookhaven employee and/or representative concerning the subject matter of the allegations in ¶¶ 79-87 of the Complaint.</p> <p>All documents referencing communications with and/or among SiteOne employees concerning the subject matter of the allegations in ¶¶ 79-87 of the Complaint.</p>	¶79 On February 1, 2023, the Town of Brookhaven filed an Amended Complaint against The Garden Dept. Corp., Narrow Way 2 LLC, Don Caroleo, Vic Caroleo, and other unknown but affiliated entities and persons in the Suffolk County Supreme Court. A copy of the Amended Complaint is attached as Exhibit 5.		<ol style="list-style-type: none"> 1. Catalono, Anthony 2. Passaro, Gerard 3. Peattie, Kevin 4. Sausto, Phil 5. Trama, Alex 6. Thistle, Greg 7. D'Onofrio, Jesse 8. Marx, Theresa 	<ol style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa 	Brookhaven and (attorney or lawyer or Ormand)	(*@siteone.com AND *brookhavernny.gov)	1/1/2023 to 3/1/2023	1/6/2023 to present

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38	All documents concerning Don's earnout for 2020 and 2021, including SiteOne's earnout calculations related thereto, communications to/from Doug Black, communications to/from Taylor Koch, and Bissett Catch Up Expenses.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Justice, Jerry 5. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Compensation or payments) and (Don or Caroleo)	(Don OR Caroleo) AND (compensation OR Payments OR earnout) AND (Doug OR Black OR Taylor OR Koch OR Bissett)	1/1/2019 to present	1/1/2019 to present
39	All documents concerning the separation of Don's employment with SiteOne and/or its decision to terminate Don, including all investigative reports, documents compiled by outside independent investigators, and submissions to decision-makers.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Terminat* or fire or let go or last day) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present

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41	All documents subsequent to the decision to terminate Don concerning Don to/from Laura Shartle.	N/A	NO	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Laura OR Shartle) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present
42	All documents subsequent to the decision to terminate Don concerning Don to/from Joe Ketter.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Joe OR Ketter) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present

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43	All documents subsequent to the decision to terminate Don concerning Don to/from Doug Black.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Doug OR Black) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present
44	All documents subsequent to the decision to terminate Don concerning Don to/from Brian Kersnowski.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Brian OR Kersnowski) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
45	All documents subsequent to the decision to terminate Don concerning Don to/from Jerry Justice.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Jerry OR Justice) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present
46	All documents subsequent to the decision to terminate Don concerning Don to/from Anthony Catalano.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Anthony OR Catalano) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
47	All documents subsequent to the decision to terminate Don concerning Don to/from Greg Thistle.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Greg OR Thistle) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present
48	All documents subsequent to the decision to terminate Don concerning Don to/from Kevin Peattie.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Kevin OR Peattie) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
49	All documents subsequent to the decision to terminate Don concerning Don to/from Sean Kramer.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Sean OR Kramer) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present
50	All documents subsequent to the decision to terminate Don concerning Don to/from Lynn Francassi.	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Lynn OR Francassi) and (Don OR Caroleo)	9/1/2022 to present	9/1/2022 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
51	Nick. All documents concerning the decision to terminate	N/A	YES	1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalono, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Nick OR Nicholas OR OR Giordano) AND (term* OR fire OR "let go" OR equity)	9/1/2022 to present	10/19/2022 to present
52	All documents reflecting communications to/from SiteOne employee Alex Trauma concerning the subject matter of the allegations contained in ¶¶ 89-90 of the Complaint.	¶89 Apparently sensing his termination was imminent, on February 15 or 16, 2023, Giordano told SiteOne employee Alex Trauma not to come into work on February 20. (Trauma, r 5.) He did not give Trauma a specific reason; since Trauma reported to Giordano at the time, Trauma did not go into work February 20. (Id.) Upon information and belief, Giordano also told other SiteOne employees not to come to work in or around this time, for no reason whatsoever.	NO	N/A	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Kersnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	N/A	(Nick OR Nicholas OR Giordano) AND (Alex OR Trama) AND ("come in" OR "go in" OR "go to" OR "come to") AND work	N/A	2/1/2023 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
52	All documents reflecting communications to/from SiteOne employee Alex Trauma concerning the subject matter of the allegations contained in ¶¶ 89-90 of the Complaint.	¶¶90 Further, shortly before Giordano's last day with SiteOne, he also asked Trauma whether Trauma would "follow him" when Giordano left. (Trauma, r 5.) Based on the context of the discussion, Trauma assumed Giordano was going to work for or start a business to compete with SiteOne and wanted Trauma to come work with him. (Id.)	NO	N/A	<ol style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa 	N/A	(Nick OR Nicholas OR Giordano) AND (Alex OR Trama) AND (follow OR join)	N/A	9/1/2022 to present
54	All documents reflecting communications by any SiteOne employee with or involving Joe Ketter, Greg Thistle and/or Anthony Catalano concerning the decision to terminate Nick.		YES	<ol style="list-style-type: none"> 1. Black, Doug 2. Brisendine, Briley 3. Caroleo, Don 4. Catalano, Anthony 5. Giordano, Nick 6. Ketter, Joe 7. Thistle, Greg 8. Justice, Jerry 9. Kersnowski, Brian 10. Koch, Taylor 	<ol style="list-style-type: none"> 1. Black, Doug 2. Catalano, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa 	(Terminat* or fire or let go or last day) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Joe OR Ketter OR Greg OR Thistle OR Anthony OR Catalano) and (Nick OR Nicholas OR Giordano) AND (term* OR fire OR "let go" OR equity)	9/1/2022 to present	10/19/2022 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
56	All documents reflecting communications by any SiteOne employee with or involving Gerard Passaro concerning the subject of the allegation contained in ¶¶94-103 of the Complaint.	¶94 At SiteOne's Coram location there is a physical file cabinet located in the sales area. (Passaro, r 12.) The top drawer of this file cabinet contained hard copies of extensive bidding and contract information for dozens of customers and projects going back approximately three years (if not longer). (Id.) These documents contained pricing, contract expiration dates, detailed project information, and other sensitive business information. (Id.) There were hundreds if not thousands of pages of documents in the top drawer of the cabinet. (Id.) Although SiteOne has additional copies of some of these documents elsewhere, there is no list of what was stored in the file cabinet and thus no way to inventory or otherwise specifically identify the documents it con-tained. (Id.)	YES	1. Caroleo, Don 2. Catalono, Anthony 3. Giordano, Nick 4. Passaro, Gerard 5. Peattie, Kevin 6. Sausto, Phil 7. Trama, Alex 8. Thistle, Greg 9. D'Onofrio, Jesse 10. Marx, Theresa	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(theft or steal* or stole* or missing or raid) and (cabinet or files or paper or computer or laptop) and (Don or Nick or Nicholas or Giordano or Caroleo)	(Gerard OR Passaro) AND (file OR cabinet OR documents OR pages OR paper)	9/1/2022 to present	2/1/2023 to present
57	¶¶ 94-103 of the Complaint.								

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
56 57		¶195 The morning after Giordano was fired-February 21, 2023 -Passaro came into work and found that all the file cabinet's documents had been removed. (Passaro ,r 13.) Addition-ally, Passaro's company-issued iPhone was at the Coram location the night Giordano was terminated, as was Passaro's regular practice. (Passaro ,r20.) The morning after Giordano's termination, customer contact information had been deleted and modified in the phone, and important business information Passaro stored in the "Notes" app on the phone had been deleted. (Id.) Giordano had the passcode to Passaro's company-issued phone. (Id.)	YES	1. Caroleo, Don 2. Giordano, Nick 3. Passaro, Gerard 4. Trama, Alex 5. D'Onofrio, Jesse 6. Marx, Theresa	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa	(dumpster or computer or laptop or desktop) and (Don or Nick or Nicholas or Giordano or Caroleo)	1. (Gerard OR Passaro) AND phone AND Notes 2. (Gerard OR Passaro) AND (pric* OR contract* OR project* OR sensitive OR confid* OR business OR propriet*)	9/1/2022 to present	2/20/2023 to present
56 57		¶196 SiteOne's Coram location has a security camera system installed. (Passaro ,r 17; Thistle ,r 7.) Approximately one week after Giordano was fired, Passaro checked the closet where the monitor and DVR recording system for the security camera system was located. (Id.) It was discovered that both the monitor and DVR recorder were missing. (Id.) These items have not found. (Id.)	N/A	N/A	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa	N/A	(Gerard OR Passaro) AND (security OR camera OR DVR OR record* OR monitor)	9/1/2022 to present	2/20/2023 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
56 57		¶197 Worse yet, the security camera system was set up to be remotely monitored by Giordano and Don Caroleo on their personal smartphones. (Passaro ,i 18; Thistle ,i 7.) The vendor who installed the security camera system was called to the property and explained that the only way to recover footage from the system is to locate the missing DVR recorder. (Thistle, 7.) The vendor further explained that it was entirely possible that someone (i.e., Giordano and Don Car- oleo) were still monitoring and/or recording the cameras remotely. (Id.)	N/A	N/A	<ol style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa 	N/A	(recover AND footage AND camera AND remote* AND monitor*)	9/1/2022 to present	2/20/2023 to present
56 57		¶198 After his conversation with the security camera vendor, Thistle walked the Coram property and identified approximately 60 to 70 cameras installed throughout the property, both inside and outside of the main building. (Thistle ,i 7.) While employees reported that some of the cameras were fake, there is no way to identify which ones are/were currently functioning and/or are continuing to provide a live feed to Don Caroleo and Giordano. (Thistle ,i 7.)	N/A	N/A	<ol style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa 	N/A	(Greg OR Thistle) AND (camera* OR video)	9/1/2022 to present	2/20/2023 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
56 57		¶100 To the extent Don Caroleo and/or Giordano is attempting to and/or currently accessing or recording the footage from these video cameras, they do not have authority from Site- One to do so. (Id.)	N/A	N/A	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa	N/A	(Don OR Caroleo OR Nick OR Giordano) AND (video OR camera)	9/1/2022 to present	2/20/2023 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
56		¶101 On March 6, 2023, it was discovered that the computer used by bookkeeper Rose Casper was missing. (Passaro, 15.) Casper was last seen in the Coram office in early February 2023. (Id.) When she came into the office, Casper would work in a small office at the Coram location. (Id.) That office was typically locked when not in use. (Id.) On March 6, 2023, a new employee began working for SiteOne, and SiteOne planned to repurpose Casper's computer for the new employee. (Id.) However, SiteOne discovered that the computer was not in the office where it was last seen, and it has not since been recovered. (Id.) Although it is unknown what information was stored on this device, the timing suggests this was another item stolen by Giordano in concert with Don and Vic Caroleo.			1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9.Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12.Hoffman, Brian 13.Ferrante, Anthony 14. Koch, Taylor 15.D'Onofrio, Jesse 16. Marx, Teresa				
57			N/A	N/A		N/A	(Rose OR Casper OR bookkeeper) AND (computer OR laptop OR desktop)	9/1/2022 to present	2/20/2023 to present

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
65	All documents containing or referring to communications to SiteOne employees advising that certain information or documents shall be treated as confidential, proprietary, or a trade secret of SiteOne.	N/A	YES	1. Catalono, Anthony 2. Passaro, Gerard 3. Peattie, Kevin 4. Sausto, Phil 5. Trama, Alex	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	trade secret	"trade secret" OR proprietary OR ("as confidential" OR "is confidential" OR "are confidential")	1/1/2020 to present	1/1/2020 to present
92	All documents concerning SiteOne's ability to access or restrict access to the website address: http://www.lccsny.com/gdw eb/SalesMobilev2.aspx .	N/A	YES	1. Caroleo, Don 2. Giordano, Nick	1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa	(heidrich w/2 frederick or lc consulting or lccsny.com)	website AND (restrict OR access)	1/1/2019	1/1/2019

RFP No.	RFP	AC	SiteOne Search	SiteOne Custodians	Proposed Custodians	SiteOne Terms	Additional Proposed Terms	SiteOne Date Range	Proposed Date Range
102	As to each Defendant, all documents and communications supporting Plaintiff's claims that Defendants entered into an agreement in furtherance of an alleged civil conspiracy against SiteOne.	N/A	NO	N/A	<ul style="list-style-type: none"> 1. Black, Doug 2. Catalono, Anthony 3. Passaro, Gerard 4. Peattie, Kevin 5. Sausto, Phil 6. Trama, Alex 7. Thistle, Greg 8. Justice, Jerry 9. Ketter, Joe 10. Korsnowski, Brian 11. Francassi, Lynn 12. Hoffman, Brian 13. Ferrante, Anthony 14. Koch, Taylor 15. D'Onofrio, Jesse 16. Marx, Teresa 	N/A	conspiracy AND (don or caroleo or Nick or Nicholas or Giordano)	N/A	9/1/2022